

## Section 1. Registration Information

### Source Identification

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Facility Name: Goal Line, LP  
Parent Company #1 Name:  
Parent Company #2 Name:

### Submission and Acceptance

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Submission Type: Re-submission  
Subsequent RMP Submission Reason: 5-year update (40 CFR 68.190(b)(1))  
Description:  
Receipt Date: 02-Jun-2009  
Postmark Date: 02-Jun-2009  
Next Due Date: 02-Jun-2014  
Completeness Check Date: 02-Jun-2009  
Complete RMP: Yes  
De-Registration / Closed Reason:  
De-Registration / Closed Reason Other Text:  
De-Registered / Closed Date:  
De-Registered / Closed Effective Date:  
Certification Received: Yes

### Facility Identification

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EPA Facility Identifier: 1000 0012 2173  
Other EPA Systems Facility ID: Cal000122995

### Dun and Bradstreet Numbers (DUNS)

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Facility DUNS: 861499762  
Parent Company #1 DUNS:  
Parent Company #2 DUNS:

### Facility Location Address

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Street 1: 555 N. Tulip St  
Street 2:  
City: Escondido  
State: CALIFORNIA  
ZIP: 92025  
ZIP4: 2532  
County: SAN DIEGO

### Facility Latitude and Longitude

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Latitude (decimal): 33.118611  
Longitude (decimal): -117.098889  
Lat/Long Method: Interpolation - Map  
Lat/Long Description: Plant Entrance (Personnel)  
Horizontal Accuracy Measure: 25  
Horizontal Reference Datum Name: North American Datum of 1983  
Source Map Scale Number: 24000

## Owner or Operator

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Operator Name:	PurEnergy, LLC
Operator Phone:	(315) 448-2266

## Mailing Address

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Operator Street 1:	1732 W. Genesee St
Operator Street 2:	
Operator City:	Syracuse
Operator State:	NEW YORK
Operator ZIP:	13204
Operator ZIP4:	1904
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

## Name and title of person or position responsible for Part 68 (RMP) Implementation

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RMP Name of Person:	Robert Mason
RMP Title of Person or Position:	Facility Manager
RMP E-mail Address:	bob.mason@goallinelp.org

## Emergency Contact

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Emergency Contact Name:	Robert Mason
Emergency Contact Title:	Facility Manager
Emergency Contact Phone:	(760) 738-4999
Emergency Contact 24-Hour Phone:	(619) 341-0419
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	bob.mason@goallinelp.org

## Other Points of Contact

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Facility or Parent Company E-mail Address:  
Facility Public Contact Phone:  
Facility or Parent Company WWW Homepage  
Address:

## Local Emergency Planning Committee

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LEPC:	Region VI LEPC
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## Full Time Equivalent Employees

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Number of Full Time Employees (FTE) on Site:	10
FTE Claimed as CBI:	

## Covered By

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OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	Yes
Air Operating Permit ID:	911504

## OSHA Ranking

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OSHA Star or Merit Ranking:

## Last Safety Inspection

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Last Safety Inspection (By an External Agency) Date:	15-Jun-2007
Last Safety Inspection Performed By an External Agency:	State environmental agency

## Predictive Filing

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Did this RMP involve predictive filing?:

## Preparer Information

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Preparer Name:	Risk Management Professionals, Inc
Preparer Phone:	(949) 282-1023
Preparer Street 1:	27405 Puerta Real
Preparer Street 2:	Suite 220
Preparer City:	Mission Viejo
Preparer State:	CALIFORNIA
Preparer ZIP:	92691
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

## Confidential Business Information (CBI)

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CBI Claimed:  
Substantiation Provided:  
Unsanitized RMP Provided:

## Reportable Accidents

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Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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## Process Chemicals

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Process ID:	1000004797
Description:	SCR Ammonia System
Process Chemical ID:	1000005379
Program Level:	Program Level 2 process
Chemical Name:	Ammonia (conc 20% or greater)
CAS Number:	7664-41-7
Quantity (lbs):	41400
CBI Claimed:	
Flammable/Toxic:	Toxic

## Process NAICS

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Process ID:	1000004797
Process NAICS ID:	1000004991
Program Level:	Program Level 2 process
NAICS Code:	221119
NAICS Description:	Other Electric Power Generation

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000003815

Percent Weight:	30.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

## Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000004269

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Percent Weight:	30.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

### Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	Spill Response Kit

### Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	Yes
Other Type:	

## **Section 4. Flammables: Worst Case**

No records found.

## **Section 5. Flammables: Alternative Release**

No records found.



## Section 6. Accident History

No records found.

## Section 7. Program Level 3

No records found.

## Section 8. Program Level 2

### Description:

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The Selective Catalytic Reduction (SCR) Ammonia is used to provide 30% aqueous ammonia for NOx abatement.

### Program Level 2 Prevention Program Chemicals

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Prevention Program Chemical ID:	1000003094
Chemical Name:	Ammonia (conc 20% or greater)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7

Process ID:	1000004797
Description:	SCR Ammonia System
Prevention Program Level 2 ID:	1000003006
NAICS Code:	221119

### Safety Information

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Safety Review Date (The date of the most recent review or revision of the safety information):	11-Sep-2008
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### Safety Compliance Regulations or Design Codes/Standards

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NFPA 58 (or state law based on NFPA 58):	
OSHA (29 CFR 1910.111):	
ASTM Standards:	
ANSI Standards:	
ASME Standards:	
None:	Yes
Other Regulation, Design Code, or Standard:	
Comments:	

### Hazard Review

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Hazard Review Date (The date of completion of most recent review or update):	04-Mar-2009
Change Completion Date (The expected or actual date of completion of all changes resulting from the hazard review):	04-Sep-2009

### Major Hazards Identified

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Toxic Release:	Yes
Fire:	
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	
Contamination:	
Equipment Failure:	Yes

Loss of Cooling, Heating, Electricity, Instrument Air: Yes  
Earthquake: Yes  
Floods (Flood Plain):  
Tornado:  
Hurricanes:  
Other Major Hazard Identified:

## Process Controls in Use

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Vents: Yes  
Relief Valves: Yes  
Check Valves: Yes  
Scrubbers: Yes  
Flares:  
Manual Shutoffs: Yes  
Automatic Shutoffs: Yes  
Interlocks:  
Alarms and Procedures: Yes  
Keyed Bypass:  
Emergency Air Supply: Yes  
Emergency Power:  
Backup Pump:  
Grounding Equipment:  
Inhibitor Addition:  
Rupture Disks:  
Excess Flow Device:  
Quench System:  
Purge System:  
None:  
Other Process Control in Use:

## Mitigation Systems in Use

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Sprinkler System:  
Dikes: Yes  
Fire Walls:  
Blast Walls:  
Deluge System:  
Water Curtain:  
Enclosure:  
Neutralization:  
None:  
Other Mitigation System in Use:

## Monitoring/Detection Systems in Use

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Process Area Detectors:  
Perimeter Monitors: Yes  
None:  
Other Monitoring/Detection System in Use:

## Changes Since Last PHA or PHA Update

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Reduction in Chemical Inventory:  
Increase in Chemical Inventory:

Change Process Parameters:  
Installation of Process Controls:  
Installation of Process Detection Systems:  
Installation of Perimeter Monitoring Systems:  
Installation of Mitigation Systems:  
None Recommended:  
None: Yes  
Other Changes Since Last PHA or PHA Update:

## Review of Operating Procedures

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Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 11-Sep-2008

## Training

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Training Review Date (The date of the most recent review or revision of training programs): 11-Sep-2008

## The Type of Training Provided

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Classroom: Yes  
On the Job: Yes  
Other Training:

## The Type of Competency Testing Used

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Written Tests: Yes  
Oral Tests:  
Demonstration:  
Observation: Yes  
Other Type of Competency Testing Used:

## Maintenance

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Maintenance Review Date (The date of the most recent review or revision of maintenance procedures): 15-Jan-2009  
Equipment Inspection Date (The date of the most recent equipment inspection or test): 15-Jun-2006  
Equipment Most Recently Inspected or Tested: Ultrasonic Tests

## Compliance Audits

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Compliance Audit Date (The date of the most recent compliance audit): 11-Sep-2008  
Audit Completion Date (The expected or actual date of completion of all changes resulting from the compliance audit): 11-Mar-2009

## Incident Investigation

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Incident Investigation Date (The date of the most recent incident investigation (if any)): 10-Jul-2007  
Incident Investigation Changes Date (Expected or actual date of completion of all changes resulting from the investigation): 31-Aug-2008

Most Recent Change Date: (The date of the most recent change that triggered a review or revision of safety information):

## Confidential Business Information

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CBI Claimed:

## Section 9. Emergency Response

### Written Emergency Response (ER) Plan

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Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?):

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Healthcare (Does facility's ER plan include information on emergency health care?):

### Emergency Response Review

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Review Date (Date of most recent review or update of facility's ER plan):

### Emergency Response Training

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Training Date (Date of most recent review or update of facility's employees):

### Local Agency

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Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Fire Department, HAZMAT Division

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (619) 338-2222

### Subject to

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OSHA Regulations at 29 CFR 1910.38:

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify):

## Executive Summary

### ACCIDENTAL RELEASE PREVENTION AND EMERGENCY RESPONSE POLICIES

The facility has developed a risk management program and emergency response plan to address California Accidental Release Prevention (CalARP) Program requirements (California Health & Safety Code, Title 19, Division 2, Chapter 4.5, §§2735-2785). Goal Line LP is extremely diligent in the handling of all chemicals and is dedicated to the safety of its employees and the neighboring community. Goal Line LP staff are highly trained and utilize modern equipment to monitor the facility and provide safeguards, while effectively and safely using ammonia as a refrigerant and for controlling NOx emissions.

The Goal Line LP facility has a long standing commitment to its workers and public safety. This commitment is demonstrated by the resources invested in accident prevention, such as personnel training and consideration of safety in the design, operation, and maintenance of the Ammonia Absorption Refrigeration and Ammonia Injection Systems. Goal Line LP's policy is to implement reasonable controls to prevent foreseeable releases of regulated substances.

The facility's charge of aqueous ammonia is 41,400 lbs. Therefore, it is over the 20,000 lbs threshold (20% or greater concentration) for EPA RMP and the 500 lbs (all concentrations) state threshold for California Accidental Release Prevention (CalARP) Program. Goal Line LP is not subject to Cal/OSHA PSM or Program 3 requirement due to the fact that the concentration of aqueous ammonia managed at the Facility is 30% and the Cal/OSHA PSM threshold quantities of aqueous ammonia is only for concentrations greater than 44%. For the reasons mentioned above, the Ammonia Injection System is subject to CalARP Program Level 2 and EPA RMP Program Level 2.

The Absorption Refrigeration Unit's charge of anhydrous ammonia is 5,160 lbs. The regulated substance is over the 500 lb threshold for the California Accidental Release Prevention (CalARP) Program but under the EPA RMP and Cal/OSHA PSM Program threshold quantity of 10,000 lbs. Therefore, the Absorption Refrigeration Unit is only subject to CalARP Program Level 2.

### STATIONARY SOURCE AND REGULATED SUBSTANCE

The Goal Line LP facility is located at 555 Tulip Street, Escondido, California. The facility is a combined cycle cogeneration facility that provides 50mW of energy and capacity to the local utility and employs 10 people at this location. The plant produces electrical power and supplies steam for operation of the ice arena. The remaining electrical power, after satisfying the facility auxiliary energy needs, is sold to San Diego Gas and Electric Company (SDG&E).

The regulated substances in use are: anhydrous ammonia for the Ammonia Absorption Refrigeration Unit and 30% aqueous ammonia for both the Ammonia Injection System and the Ammonia Absorption System.

The maximum inventory and storage for the regulated substances are contained in the following vessels:

• Aqueous Ammonia Storage Tank (T-1902-1) 41,400lbs

• Anhydrous Ammonia Storage Receiver (V-1804-14) 5,160 lbs

### HAZARD ASSESSMENT SUMMARY/OFFSITE CONSEQUENCE ANALYSIS

Ammonia Injection System 30% Aqueous Ammonia

#### Worst-Case Release Scenario Results Summary

Scenario Description: One worst case analysis has been defined as a release of the maximum quantity of aqueous ammonia that can be stored in the largest equipment item in a ten (10) minute period.

#### Alternative Release Scenario Results Summary

Scenario Description: A more realistic alternative release scenario was modeled as a release of aqueous ammonia as a result of a rupture of a transfer hose used to fill aqueous ammonia to the SCR Ammonia Storage Tank.



## Risk Considerations

Although the storage and use of anhydrous and aqueous ammonia has inherent potential risks, and worst-case release scenarios can potentially reach the community; Goal Line LP has recognized these potential risks and structured its safety programs to make the worst case type of event non-credible. In addition to the safety practices of the company and plant personnel to make this worst-case event non-credible, it should also be recognized that there are inherent analysis assumptions that make the results of the atmospheric dispersion analysis appear worse than what would actually be expected during such an event (e.g., In the event of a release, sudden rupture and flashing of ammonia would be highly turbulent. Turbulence causes entrainment of air and the released vapor dilutes much more quickly than is shown in the model).

In addition to the use of conservative analysis assumptions that over-predict the effects of a potential release, other characteristics of the facility and site serve to minimize the potential risks associated with an ammonia release:

- Although, the facility is not subject to Cal/OSHA PSM, the facility prevention program meets and exceeds the PSM requirements.
- Ammonia sensors are located in the process area.
- Automatic/Manual shutdowns in place.
- Personal Protective Equipment (PPE) is used by plant personnel, as necessary.
- The history of the Goal Line LP facility (i.e., no CalARP-applicable ammonia releases) reflects the adequacy of the design and diligence of the plant staff in safely operating the Ammonia Absorption Refrigeration and Selective Catalytic Reduction Units.

## ACCIDENTAL RELEASE PREVENTION PROGRAM AND CHEMICAL-SPECIFIC PREVENTION STEPS

As part of the implementation of this CalARP Program, even though the Ammonia Absorption Refrigeration Unit and The Ammonia Injection System for Selective Catalytic Reduction are only subject to Prevention Program 2 requirements, Prevention Program 3 elements were implemented by Goal Line LP to manage process safety issues associated with the use of ammonia for the NOx abatement, as well as for the refrigeration system. In addition, common industry standards, policies, and procedures are currently utilized to ensure safe practices are being performed.

The required CalARP Prevention Program 2 elements include:

- Safety Information
- Hazard Review
- Operating Procedures
- Training
- Maintenance
- Compliance Audits
- Incident Investigation

Furthermore, key emergency response elements are addressed in the facility's Emergency Action Plan. See EMERGENCY RESPONSE PROGRAM below.

## FIVE-YEAR ACCIDENT HISTORY

There have been no CalARP-applicable releases of ammonia at Goal Line LP in the past five years.

## EMERGENCY RESPONSE PROGRAM

The Goal Line LP facility is owned by PurEnergy and operated by PurEnergy Operating Services, LLC (PEOS). Goal Line LP supplies thermal coolant to the Iceoplex Sports Facility for the operation of its equipment/facility and supplies surplus electricity to San Diego Gas & Electric.

The Goal Line LP facility has filed a Chemical Inventory Business Emergency Plan with the San Diego county Hazardous Materials Division and this plan includes:

• Emergency Alarm Procedures  
• Evacuation Procedures  
• Safety and Health Considerations  
• Notification Procedures

This Plan meets the requirements of the Emergency Action Plan (EAP) of the CCR Title 8 §3220.

#### PLANNED CHANGES TO IMPROVE SAFETY

The Hazard Review study has been conducted to examine mitigation measures to improve safety at the facility. Planned changes to improve safety are listed as recommendations in the March 4th, 2009 Hazard Review Report. Any outstanding recommendations will have been addressed by September 2009.

#### REGISTRATION INFORMATION

A copy of the RMP Submittal printout is provided in section 6.0.

#### FLAMMABLES: WORST CASE

The use of flammable materials Goal Line LP is not encompassed by either the federal or state RMP requirements. Therefore, this section is not applicable.

#### FLAMMABLES: ALTERNATIVE RELEASE

The use of flammable materials at the facility is not encompassed by either the federal or state RMP requirements. Therefore, this section is not applicable.

#### PREVENTION PROGRAM LEVEL

The Ammonia Absorption Refrigeration System is a CalARP Program Level 2 process, the Ammonia Injection System is a CalARP Program Level 2 and EPA RMP Program Level 2 process but Goal Line LP implements a Prevention Program 3 for both processes. Supplemental information for Program 3 elements is located in the Goal Line LP CalARP Compliance Workbook; the relevant references are listed in Table 1.

#### EXTERNAL EVENTS ASSESSMENT

Pursuant to the requirements of California Health & Safety Code, Title 19, Division 2, Chapter 4.5, §2745.6(l), the following are the external events that are requisite by the regulations:

• The types of natural and human caused external events considered in PHA Section 2760.2 or Hazard Review Section 2755.2.  
• The estimated magnitude or scope of external events which were considered. If not known, the owner or operator of the stationary source shall work closely with the AA to determine what is required. If seismic events are applicable, the parameters used in the consideration of the seismic analysis and which edition of the Uniform Building Code was used when the process was designed.

• For each external event, with a potential to create a release of a regulated substance that will reach an endpoint offsite, apply  
o The expected date of completion of any changes resulting from the PHA;  
o Major hazards identified;  
o Process controls in use;  
o Mitigation systems in use;  
o Monitoring and detection systems in use; and,  
o Changes since the last Hazard Review.  
• The date of the most recent field verification that equipment is installed and maintained as designed.

All of the regulatory requirements for external events that can conceivably cause a release of ammonia at Goal Line LP were addressed during the March 4th 2009 Hazard Review. The results can be found in the Hazard Review documentation located in the CalARP Compliance Workbook.